

HOGAN & HARTSON LLP

Attorneys for Defendant
875 Third Avenue
New York, NY 10022
Phone (212) 918-3000
Facsimile (212) 918-3100

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
TOTALMAR NAVIGATION CORP.,	:	
	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
	:	ECF Case
-against-	:	
	:	
ATN INDUSTRIES INC.,	:	Notice of Filing of
	:	Translations of Exhibits
	:	
Defendant.	:	
-----	x	

Please take notice of the filing of the annexed translations of exhibits 2, 4, 6, 8, and 10 of Docket No. 6, Defendant's Answer, Affirmative Defenses and Verified Counterclaim that was filed and served on June 25, 2008.

Dated: July 3, 2008

Respectfully submitted,

By _____/s/_____
George F. Hritz
Hogan & Hartson LLP
875 Third Avenue
New York, NY 10022
Tel: (212) 918-3000
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Email: gfhritz@hhlaw.com

John F. O'Sullivan
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Mellon Financial Center
1111 Brickell Avenue, Suite 1900
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Tel: (305) 459-6500
Fax: (305) 459-6550
Email: jfosullivan@hhlaw.com

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
TOTALMAR NAVIGATION CORP.,	:	
	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
	:	ECF Case
-against-	:	
	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
-----	X	

AFFIRMATION OF SERVICE

George F. Hritz affirms under penalty of perjury:

I am an attorney admitted to practice in the State of New York and am a partner with the law firm of Hogan & Hartson LLP, attorneys for Defendant in the above-captioned matter.

I certify that on July 3, 2008, I electronically filed the Notice of Filing of Translations of Exhibits and annexed exhibits, and they are being served this day on all counsel authorized to receive Notices of Electronic Filing generated by CM/ECF, including counsel specified below:

Rahul Wanchoo, Esq.
Law Offices of Rahul Wanchoo
Empire State Building
350 Fifth Avenue, 59th Floor
New York, New York 10118
Attorneys for plaintiff Totalmar Navigation Corp.

Dated: July 3, 2008

_____/s/_____
George F. Hritz

EXHIBIT 2



Caracas, May 06, 2008

Totalmar Navigation Corp., Inc.

This city. –

Dear Sir or Madame:

PEOPLE'S MINISTRY FOR INTERNAL AFFAIRS AND JUSTICE
44TH NOTARY PUBLIC FOR THE
MUNICIPALITY OF LIBERTADOR



BOLIVARIAN REPUBLIC OF VENEZUELA

The purpose of this letter is to request, in a timely fashion, compensation for the damages caused to 31 broken pipes, described as follows: steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203) belonging to the cargo of the **ship "Skala,"** which arrived from Shanghai, China, at the Port of Maraciabo, Venezuela, on January 16, 2008, with a total of 430 pipes, as listed in the attached table. The damages occurred during the maritime crossing.

Therefore, we request that you immediately pay us the corresponding amount as compensation for the damages that were caused.

The amount of this claim is Five Hundred Eighty-Seven Thousand Seven Hundred Thirty Dollars and Eleven Cents (US\$ 587,630.11).

As there are no further issues to discuss, we remain at your disposal.

Sincerely,
[illegible signature]
Jose Martin Olivares
President



8401 N.W. 53rd Terrace, Suite 209 • Miami, Florida 33166, U.S.A.
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e-mail: atind@bellsouth.net

THE SHIP “SKALA”

Ship:	Skala
Arrival Date:	January 16, 2008
Total No. of Pipes:	430
No. of Pipes that were Damaged:	31
Type of Pipes	2,600 mm
Description of Pipes:	Steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203).
Unit Cost per Pipe:	US\$ 18,955.81
Total Cost for Damaged Pipes:	US\$ 587,630.11

PEOPLE'S MINISTRY FOR INTERNAL AFFAIRS AND JUSTICE
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 MUNICIPALITY OF LIBERTADOR



BOLIVARIAN REPUBLIC OF VENEZUELA

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TRANSLATION CERTIFICATION

This is to certify that the translation of the attached document(s), **Ref.: Claim for cargo damages pertaining to MV Skala dated May 6, 2008**, was performed by a professional translator and is to the best of our knowledge and ability, a true and accurate translation of the original text delivered to Language Innovations, LLC by our client, **Hogan & Hartson, LLP**. The original document was translated from **Spanish** into **English** and at completion delivered to the client on **June 26, 2008**.

I hereby declare that all statements made herein are of my own knowledge and are true and that all statements made based on information or belief are believed to be true.

Language Innovations, LLC hereby agrees to keep the content of this translation confidential according to ethical and legal standards of the profession of Translation. Language Innovations, LLC agrees not to discuss, evaluate, distribute or reproduce any material included in or related to the translation of this document.

Date: June 26, 2008

Signature: 
Mariela Diaz-Butler, Manager
Language Innovations, LLC

Subscribed and sworn before me this 26th day of JUNE, 2008, at Washington, DC.

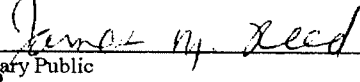
JAMES M. REED
Notary Public District of Columbia
My Commission expires June 30, 2012

Notary Public

EXHIBIT 4

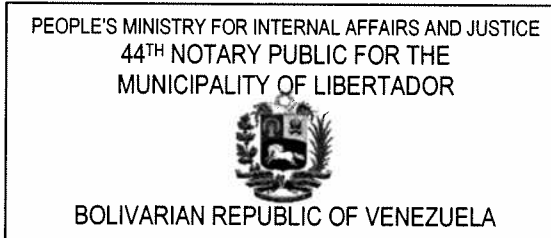


Caracas, May 06, 2008

Totalmar Navigation Corp., Inc.

This city. –

Dear Sir or Madame:



The purpose of this letter is to request, in a timely fashion, compensation for the damages caused to 17 broken pipes, described as follows: steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203) belonging to the cargo of the ship **“Rainbow,”** as listed in the attached table. The damages occurred during the maritime crossing.

Therefore, we request that you immediately pay us the corresponding amount as compensation for the damages that were caused.

The amount of this claim is Three Hundred Twenty-two Thousand Two Hundred Forty-eight Dollars and Seventy-seven Cents (US\$ 332,248.77).

As there are no further issues to discuss, we remain at your disposal.

Sincerely,
[illegible signature]
Jose Martin Olivares
President



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THE SHIP “RAINBOW”

Ship:	Rainbow
Arrival Date:	March 04, 2008
Total No. of Pipes:	357
No. of Pipes that were Damaged:	17
Type of Pipes	2,600 mm
Description of Pipes:	Steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203).
Unit Cost per Pipe:	US\$ 18,955.81
Total Cost for Damaged Pipes:	US\$ 322,248.77

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TRANSLATION CERTIFICATION

This is to certify that the translation of the attached document(s), **Ref.: Claim for cargo damages pertaining to MV Rainbow dated May 6, 2008**, was performed by a professional translator and is to the best of our knowledge and ability, a true and accurate translation of the original text delivered to Language Innovations, LLC by our client, **Hogan & Hartson, LLP**. The original document was translated from **Spanish** into **English** and at completion delivered to the client on **June 26, 2008**.

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Date: June 26, 2008

Signature: 
Mariela Diaz-Butler, Manager
Language Innovations, LLC

Subscribed and sworn before me this 26th day of JUNE, 2008, at Washington, DC.

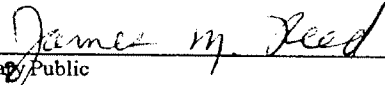
JAMES M. REED
Notary Public District of Columbia
My Commission expires June 30, 2012
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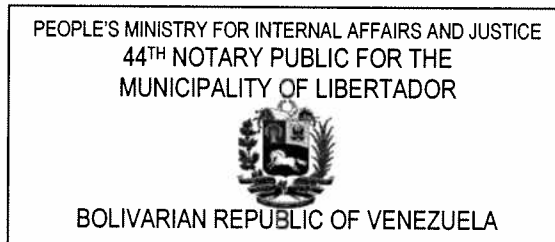
EXHIBIT 6



Totalmar Navigation Corp., Inc.

This city. –

Dear Sir or Madame:



Caracas, May 06, 2008

The purpose of this letter is to request, in a timely fashion, compensation for the damages caused to 13 broken pipes, described as follows: steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,400 mm; minimum thickness: 14.50 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203) belonging to the ship "Go Star," as listed in the attached table. The damages occurred during the maritime crossing.

Therefore, we request that you immediately pay us the corresponding amount as compensation for the damages that were caused.

The amount of this claim is Two Hundred Twenty-Two Thousand Eight Dollars and Two Cents (US\$222,008.02).

As there are no further issues to discuss, we remain at your disposal.

Sincerely,
[illegible signature]
Jose Martin Olivares
President



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e-mail: atind@bellsouth.net

THE SHIP “GO STAR”

Ship:	Go Star
Arrival Date:	March 06, 2008
Total No. of Pipes:	431
No. of Pipes that were Damaged:	13
Type of Pipes	2,400 mm
Description of Pipes:	Steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,400 mm; minimum thickness: 14.50 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203).
Unit Cost per Pipe:	US\$ 17,077.54
Total Cost for Damaged Pipes:	US\$ 222,008.02

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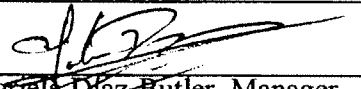
TRANSLATION CERTIFICATION

This is to certify that the translation of the attached document(s), **Ref.: Claim for cargo damages pertaining to MV Go Star dated May 6, 2008**, was performed by a professional translator and is to the best of our knowledge and ability, a true and accurate translation of the original text delivered to Language Innovations, LLC by our client, **Hogan & Hartson, LLP**. The original document was translated from **Spanish** into **English** and at completion delivered to the client on **June 26, 2008**.

I hereby declare that all statements made herein are of my own knowledge and are true and that all statements made based on information or belief are believed to be true.

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Date: June 26, 2008

Signature: 
Mariela Diaz-Butler, Manager
Language Innovations, LLC

Subscribed and sworn before me this 26th day of JUNE, 2008, at Washington, DC.

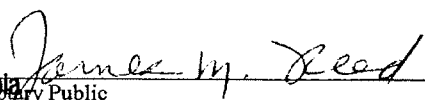
JAMES M. REED
Notary Public District of Columbia
My Commission expires June 30, 2012

Notary Public

EXHIBIT 8



Totalmar Navigation Corp., Inc.

This city. –

Dear Sir or Madame:

PEOPLE'S MINISTRY FOR INTERNAL AFFAIRS AND JUSTICE
44TH NOTARY PUBLIC FOR THE
MUNICIPALITY OF LIBERTADOR



BOLIVARIAN REPUBLIC OF VENEZUELA

Caracas, May 06, 2008

The purpose of this letter is to request, in a timely fashion, compensation for the damages caused to 15 broken pipes, described as follows: steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203) belonging to the **ship "Atlantica,"** as listed in the attached table. The damages occurred during the maritime crossing.

Therefore, we request that you immediately pay us the corresponding amount as compensation for the damages that were caused.

The amount of this claim is Two Hundred Eighty-four Thousand Three Hundred Thirty-seven Dollars and Fifteen Cents (US \$284,337.15).

As there are no further issues to discuss, we remain at your disposal.

Sincerely,
[illegible signature]
Jose Martin Olivares
President



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Tel: (305) 468-8600 • Fax (305) 468-9080
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e-mail: atind@bellsouth.net

THE SHIP “ATLANTICA”

Ship:	Atlantica
Arrival Date:	January 20, 2008
Total No. of Pipes:	435
No. of Pipes that were Damaged:	15
Type of Pipes	2,600 mm
Description of Pipes:	Steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203).
Unit Cost per Pipe:	US\$ 18,955.81
Total Cost for Damaged Pipes:	US\$ 284,337.15

PEOPLE'S MINISTRY FOR INTERNAL AFFAIRS AND JUSTICE
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TRANSLATION CERTIFICATION

This is to certify that the translation of the attached document(s), **Ref.: Claim for cargo damages pertaining to MV Atlantic dated May 6, 2008**, was performed by a professional translator and is to the best of our knowledge and ability, a true and accurate translation of the original text delivered to Language Innovations, LLC by our client, **Hogan & Hartson, LLP**. The original document was translated from **Spanish** into **English** and at completion delivered to the client on **June 26, 2008**.

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Date: June 26, 2008

Signature: 
Mariela Diaz-Butler, Manager
Language Innovations, LLC

Subscribed and sworn before me this 26th day of JUNE, 2008, at Washington, DC.

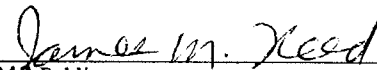
JAMES M. REED
Notary Public District of Columbia 
My Commission Expires June 30, 2012 Public

EXHIBIT 10

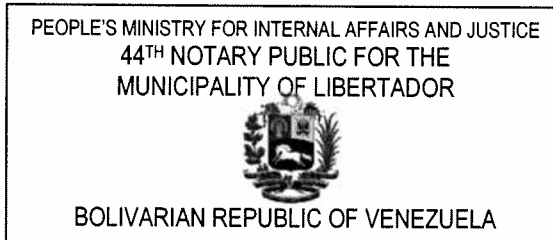


Caracas, May 06, 2008

Totalmar Navigation Corp., Inc.

This city. –

Dear Sir or Madame:



The purpose of this letter is to request, in a timely fashion, compensation for the damages caused to 16 broken pipes, described as follows: steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203) belonging to the ship **“Majartta,”** as listed in the attached table. The damages occurred during the maritime crossing.

Therefore, we request that you immediately pay us the corresponding amount as compensation for the damages that were caused.

The amount of this claim is Three Hundred Three Thousand Two Hundred Ninety-two Dollars and Ninety-six Cents (US \$303,292.96).

As there are no further issues to discuss, we remain at your disposal.

Sincerely,
[illegible signature]
Jose Martin Olivares
President



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Caracas Office: Tel.: (58-212) 959.6763 Fax: (58-212) 959.8418
e-mail: atind@bellsouth.net

THE SHIP “MAJARTTA”

Ship:	Majarrrta
Arrival Date:	February 25, 2008
Total No. of Pipes:	485
No. of Pipes that were Damaged:	16
Type of Pipes	2,600 mm
Description of Pipes:	Steel alloy pipes with beveled ends for soldering, manufactured per AWWA C-200 specifications or equivalent, made of materials with metallurgical characteristics similar to those for ASTM A-36 or API 5L-B Specifications; with a nominal diameter of 2,600 mm; minimum thickness: 15.88 mm; nominal length: 12m.; exterior coating: coal tar epoxy-polyamide with a thickness of 16 mils; interior coating: inert coal tar epoxy, with a total thickness of 16 mils; or coal tar enamel (AWWA C-203).
Unit Cost per Pipe:	US\$ 18,955.81
Total Cost for Damaged Pipes:	US\$ 303,292.96

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TRANSLATION CERTIFICATION

This is to certify that the translation of the attached document(s), **Ref.: Claim for cargo damages pertaining to MV Majartta dated May 6, 2008**, was performed by a professional translator and is to the best of our knowledge and ability, a true and accurate translation of the original text delivered to Language Innovations, LLC by our client, **Hogan & Hartson, LLP**. The original document was translated from **Spanish** into **English** and at completion delivered to the client on **June 26, 2008**.

I hereby declare that all statements made herein are of my own knowledge and are true and that all statements made based on information or belief are believed to be true.

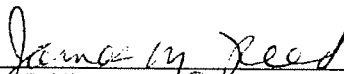
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Date: JUNE 26, 2008

Signature: 
Maricela Diaz-Butler, Manager
Language Innovations, LLC

Subscribed and sworn before me this 26th day of JUNE, 2008, at Washington, DC.

JAMES M. REED
Notary Public District of Columbia
My Commission expires June 30, 2012


Notary Public